

No. PD-0881-20

IN THE TEXAS COURT OF
CRIMINAL APPEALS

FILED
COURT OF CRIMINAL APPEALS
12/17/2021
DEANA WILLIAMSON, CLERK

CRYSTAL MASON,
APPELLANT

v.

THE STATE OF TEXAS,
APPELLEE

On Discretionary Review from the Second Court of Appeals of Texas, No. 02-18-00138-CR, Appeal in Cause No. 1485710D in the 432nd District Court of Tarrant County, Texas, the Honorable Ruben Gonzalez, Presiding

**MOTION FOR LEAVE TO FILE THE STATE'S RESPONSE TO
APPELLANT'S SUPPLEMENTAL BRIEF**

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**TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL
APPEALS:**

Pursuant to Texas Rule of Appellate Procedure 70.4, The State of Texas, Appellee, respectfully submits this motion for leave to file the State's response to Appellant's supplemental brief. In support of this Motion, The State would show:

1. This case was submitted in this Court on August 25, 2021.
2. Appellant filed a supplemental brief on December 3, 2021.
3. Appellant brief alleges that a new retroactive law that went into effect after this case was submitted materially affects the case.
4. The State requests leave to file a response to Appellant's supplemental brief in order to provide this Court with an explanation of why the new law should not affect the outcome of this case.

PRAYER

For the foregoing reasons, The State respectfully asks the Court to grant leave to file the Appellant's Supplemental Brief.

Respectfully submitted,

SHAREN WILSON
Criminal District Attorney
Tarrant County, Texas

JOSEPH W. SPENCE
Assistant Criminal District Attorney
Chief, Post-Conviction

/s/ John E. Meskunas
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CERTIFICATE OF SERVICE

A true copy of the State's brief has been e-served to opposing counsel:

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on the 17th day of December, 2021.

/s/ John E. Meskunas
JOHN E. MESKUNAS

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